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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
TRENTON VICINAGE

JENNIFER PASQUARELLO and
MICHELLE ANGELINA,

Plaintiffs,

v.

GOVERNOR PHIL MURPHY, et al,

Defendants.

Hon. Zahid N. Quraishi, U.S.D.J.
Hon. Douglas E. Arpert, U.S.M.J.

DOCKET NO.: 3:21-cv-18806

Civil Action

**CERTIFICATION OF
RYAN O'DEA**

I, Ryan O'Dea, being of full age, hereby certify as follows:


1. I am the Associate Administrator of Edna Mahan Correctional Facility for Women and am fully familiar with the facts contained in this certification.
2. On or about April 13, 2022, an Internal Management Procedure revision was made for all cell housing areas of Edna Mahan Correctional Facility.
3. Pursuant to that change, cells were to be locked and unlocked by the unit officer only, inmates were not permitted on any wing or tier other than their assigned wing or tier, and inmates were not to loiter on the wing or tier or other areas not designated for congregation. Inmates were to be locked inside their cells when not authorized to be in another area, and where an inmate is authorized to exit their cell, the unit officer will lock an inmate's cell door upon the inmate exiting. In addition, when an inmate was authorized to exit their cell, the unit officer was to lock the door upon the inmate exiting. Upon the inmate returning from an authorized area, the officer was to unlock the cell door and secure the inmate in their cell no later than the officer's next tour.
4. On or about May 9, 2022, the above policy was modified as follows. Cell doors will open for the day once the 6:00 a.m. count has cleared. Cell doors will be locked during count time, at the end of the day, during institutional codes and emergencies, and at any time deemed necessary by the Shift Commander, or for safety and security needs.

5. Once unlocked, doors must remain in the closed position at all times, including when inmates are in their cells. Inmates are not permitted to enter cells of other inmates at any time; all congregate interaction must take place in the unit day space. Loitering and/or congregating on the tier is prohibited.

6. These changes to cell-housing procedure will be incorporated into the next version of the EMCF Handbook.

7. These enhanced measures are designed to allow the inmate population to have freedom of movement while simultaneously allowing security staff to have clear sight lines to ensure the safety of the populations. Ultimately, these measure enhance security and protect the inmate population.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I may be subject to punishment.



Ryan O'Dea
Associate Administrator
Edna Mahan Correctional Facility for Women

Dated: 5/19/22